

IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

Branch Banking & Trust
Company,

Plaintiff

v.

Odyssey (VIII) DP I, LLC f/k/a
Odyssey (VI) Commercial DP III,
LLC, Lawrence Todd Maxwell
and William D. Drost

Defendants

Case No: 1:13-cv-00643-RLV

ANSWER

Odyssey (VIII) DP I, LLC and William D. Drost answer the Complaint (DE 1) and state as follows in response to each paragraph thereof:

1. Without knowledge and therefore denied.
2. Admitted.
3. Denied.
4. Admitted that Drost is a resident of the State of Florida.

Otherwise, denied.

5. Admitted.

6. Admitted for the purposes of jurisdiction. Otherwise, denied.

7. Admitted for the purposes of venue. Otherwise, denied.

8. Admitted that Odyssey executed the document attached as Exhibit A. Otherwise, denied.

9. Admitted.

10. This paragraph states no factual allegations. Therefore, no response is required.

11. Admitted.

12. It is admitted that the Note contains the language, subject to the context, meaning, and effect given to the document, which speaks for itself.

13. It is admitted that Odyssey executed the Deed to Secure Debt. Otherwise, denied.

14. Without knowledge and therefore denied.

15. Admitted.

16. Without knowledge and therefore denied.

17. Admitted.

18. Without knowledge and therefore denied.

19. It is admitted that Drost executed the Drost Guaranty, a copy of which is attached to the Complaint. Otherwise, denied.

20. It is admitted that the Guaranties contain the language, subject to the context, meaning, and effect given to the document, which speaks for itself.

21. It is admitted that the Guaranties contain the language, subject to the context, meaning, and effect given to the document, which speaks for itself.

22. Admitted.

23. Admitted.

24. Admitted.

25. Admitted.

26. Without knowledge and therefore denied.

27. Admitted.

28. Without knowledge and therefore denied.

29. Admitted.

30. Denied.

31. Denied.

32. Without knowledge and therefore denied.

33. Denied.

34. Denied.

35. Denied.

36. Odyssey restates its responses to the paragraphs indicated.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Drost restates his responses to the paragraphs indicated.

42. Denied.

43. Denied.

44. Denied.

45. Denied.

46. Defendants restate their responses to the paragraphs indicated.

47. Denied.

48. Denied.

49. Denied.

WHEREFORE, Defendants demand judgment for Defendants.

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following CM/ECF participants:

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This 28th day of March, 2013

/s/ Matthew R. Clark
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